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January 24, 2013

**VIA ELECTRONIC FILING**

Jocelyn Boyd, Esquire  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
101 Executive Center Drive  
Columbia, SC 29210

RE: Application of Tega Cay Water Service, Inc. for Adjustment of Rates and Charges and  
Modifications of Certain Terms and Conditions for the Provision of Water and Sewer  
Service  
Docket No. 2012-177-WS

Dear Ms. Boyd:

Enclosed please find the prefiled **Testimony of Karen Sasic in Response to Public Testimony of 1/8/13** filed on behalf of Tega Cay Water Service, Inc. in the above referenced docket. By copy of this letter, I am serving all parties of record electronically.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott

SE/mjl

Enclosure

cc: All parties of record w/enc.  
Charles L.A. Terreni, Esquire  
John M.S. Hoefer, Esquire

1  
2  
3 **BEFORE**  
4  
5 **THE PUBLIC SERVICE COMMISSION**  
6  
7 **OF SOUTH CAROLINA**  
8  
9 **DOCKET NO. 2012-177-WS**

10 IN RE: Application of Tega Cay Water Service, )      PREFILED  
11 Inc. for Adjustment of Rates and Charges and )      TESTIMONY  
12 Modifications to Certain Terms and Conditions )      OF KAREN SASIC IN  
13 For the Provision of Water and Sewer Service )      RESPONSE TO PUBLIC  
14 \_\_\_\_\_ )      TESTIMONY OF 1/8/13

15  
16 **Q. MS. SASIC, WILL YOU PLEASE STATE YOUR FULL NAME?**

17 **A.** Yes. My name is Karen Sasic.

18  
19 **Q. ARE YOU THE SAME KAREN SASIC WHO PREFILED DIRECT, REBUTTAL**  
20 **AND COLLECTIVE TESTIMONY IN THIS DOCKET?**

21 **A.** Yes, I am.

22  
23 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY HERE?**

24 **A.** The purpose of my testimony is to address concerns raised by the public witnesses at the  
25 Merits Hearing in this docket held on January 8, 2013 in Columbia, South Carolina.

26  
27 **Q. WITH EACH OF THE PUBLIC WITNESSES WHO TESTIFIED AT THE MERITS**  
28 **HEARING, WOULD YOU PLEASE ADDRESS THEIR CONCERNS RAISED BEFORE**  
29 **THIS COMMISSION ON JANUARY 8, 2013?**

30 **Tommy Eisele, 3028 Point Clear Drive**

31 **A.** Mr. Eisele expressed concerns about maintenance issues at the lift station near his home.

1 Mr. Eisele also testified that service has improved since the lift station upgrade was completed in  
2 the summer of 2012.

3 A review of Mr. Eisele's service records show that he has contacted our office on several  
4 occasions since he purchased his home in Tega Cay three years ago. Following is a summary of  
5 TCWS's communications with Mr. Eisele.

6 – On March 3, 2010, Mr. Eisele called to report a sewer spill going into the lake.

7 Our field personnel contacted him and advised there was not an overflow occurring  
8 at the time of his call. The last overflow at this location occurred on February 5,  
9 2010.

10 – On March 17, 2010, Mr. Eisele called to report overgrown bushes in the area of the  
11 lift station near his home. Our field personnel responded and trimmed the bushes  
12 the same day it was reported.

13 – On August 27, 2010, Mr. Eisele called to report that our employees, trucks and  
14 equipment were frequently visiting the lift station. Our field personnel spoke to Mr.  
15 Eisele and advised they were conducting routine maintenance on the lift station.

16 – On November 12, 2010, Mr. Eisele stated he planted bushes near the lift station that  
17 were trampled on. Our field personnel explained to Mr. Eisele that the plants  
18 were blocking access to the lift station. Our field personnel make every effort to  
19 respect the property of our customers when we require access to our facilities.,

20 – On February 7, 2011, Mr. Eisele again called to report water leaking from his  
21 retaining wall. A thorough investigation was completed by our field personnel and  
22 they determined the water coming from the retaining wall was from recent rainfall  
23 and not a leak in a water line.

24 – -On December 12, 2011, Mr. Eisele called to report water near the retaining wall.

1 Our personnel explained that the water was not caused by a leak in the water line  
2 and that it was caused by the recent heavy rainfall. On February 22, 2012, Mr.  
3 Eisele reported a leak in his driveway. Our field personnel investigated his  
4 concerns about the leak and determined the water observed by Mr. Eisele was  
5 caused by water runoff.

- 6 – On May 23, 2012, Mr. Eisele called to speak to our Area Manager, Mike Davis,  
7 about a water leak. Mr. Eisele reported that the leak indicator on his meter was  
8 spinning even though all water was turned off in his home. Mike Davis explained  
9 that according to the facts Mr. Eisele was reporting, the leak would be on his side of  
10 the meter, and therefore was his responsibility to repair.
- 11 – On August 27, 2012, Mr. Eisele reported water running down the side of the  
12 driveway. Our personnel determined the water main was leaking and called in line  
13 locates. Repairs were completed on the water line on August 31, 2012.

14  
15 **Gene Esarove, 3081 Point Clear Drive**

16 A. This witness spoke of two events which occurred about five or six years ago. Tega Cay's  
17 counsel will move to strike this testimony because the events to which the witness testified are  
18 outside the test year and are too remote to have probative value. I note, however, that Mr. Esarove  
19 lives across the street from the recently upgraded Lift Station No. 3, an improvement made to  
20 address the sort of problem that Mr. Esarove described as happening five or six years ago.

21 Mr. Esarove also complained about the taste of his water, stating that he had to filter the  
22 water before drinking it and that it leaves a red ring in his toilet. As noted in the hearing, TCWS  
23 purchases bulk water from York County and distributes it through PCV pipes to its customers.  
24 TCWS's water has met all quality standards when tested by DHEC. While we have not had a lot

1 of complaints about water quality in the TCWS service area, taste is a subjective criteria, and some  
2 customers may find it preferable to filter their water. The red ring left by standing water in Mr.  
3 Esarove's toilet is likely the result of commonly occurring bacteria which is frequently found in  
4 bathroom fixtures.

5  
6 **Shantel Wiley, 7024 Chelsea Day Lane**

7 A. This witness described a newspaper article about Linda Stevenson and subject to objection,  
8 introduced the article into the record. Tega Cay counsel will move to strike this testimony  
9 because the article is inadmissible hearsay and irrelevant and any probative value is outweighed by  
10 the prejudice to the Applicant.

11  
12 **Karen Licausi, 5026 Tara Tea Drive**

13 A. Tega Cay counsel will move to strike certain of Ms. Licausi's testimony and exhibit.  
14 However, subject to its objection, it is important for the Commission to understand the water  
15 sampling process which the witness mentions and the favorable testing results from the water test  
16 of the witness' home. In 2011, Tega Cay collected and submitted 20 lead and copper samples  
17 within our regular 3-year testing cycle as required by rule and statute. The results came back from  
18 DHEC late in the fall of 2011 with the lead Action Limit of 15 parts per billion at the 90<sup>th</sup>  
19 percentile value. This reading exceeded DHEC regulations which required Tega Cay to mail a  
20 Public Notice to all customers informing them of the results of the analysis and containing  
21 language that is specified by USEPA. This was done in January of 2012.

22 Subsequently, as required by the DHEC Lead and Copper Rule, Tega Cay was then  
23 required to sample from 40 DHEC-approved sample sites for two consecutive six-month periods.  
24 Tega Cay sampled in the first half of 2012 and again in the second half of 2012. The first round of

1 samples indicated that Tega Cay was well below the DHEC Action Limit. Prior to the second  
2 round of testing this customer registered her concerns. At the same time the ORS requested that we  
3 sample some houses that had participated in the 2011 sampling but had opted out in 2012.

4 During the ORS site visit in October 2012, Willie Morgan of the ORS and Mac Mitchell of  
5 Tega Cay went to Ms. Licausi's home and spoke with her. Mr. Morgan and Mr. Mitchell  
6 determined that Ms. Licausi's home -- which had not been previously tested -- had copper  
7 plumbing and that the house qualified as a potential sample site under the Lead and Copper Rule.  
8 Tega Cay agreed to request that Ms. Licausi's house be added to the DHEC-approved sample plan,  
9 which DHEC then approved. Ms. Licausi's house was included in the sampling plan that was  
10 then under way. She collected a water sample and Tega Cay submitted it for analysis. The results  
11 from her home were 0.00 mg/l for lead (Pb) and 0.031 mg/l for copper (Cu), well below the DHEC  
12 Action Limits of 0.015 mg/l for lead and 1.3 mg/l for copper..On December 28, 2012, Ms. Licausi  
13 was sent a letter from Tega Cay informing her of the test results.

14 In summary, no lead was detected in Ms. Licausi's water sample. Ms. Licausi's water is  
15 safe for her and her dog to drink. There has been no change in the water treatment methodology  
16 utilized by the City of Rock Hill (the source of all of TCWS' water supply) nor has there been any  
17 change in the water distribution network within Tega Cay.

18  
19 **Joyce Clark, 3026 Point Clear Drive**

20 A. Ms. Clark testified that Tega Cay has fixed locks, removed debris, and addressed customer  
21 concerns expressed at the public hearing held on December 3, 2011, over the condition of its 19 lift  
22 stations. While Ms. Clark did submit certain hearsay testimony to which counsel will be  
23 objecting, I would point out that Ms. Clark has contacted Tega Cay Customer Service on three  
24 occasions:

- 1       – On May 23, 2008, Ms. Clark called to report an odor at a lift station. Our operator found
- 2       no odor present when he arrived and told Ms. Clark he would keep a check on the lift
- 3       station.
- 4       – On May 23, 2011, Ms. Clark called to report an odor at the lift station. Our operator
- 5       replaced the deodorizing bag and took measurements for a filter insert to control odors.
- 6       – On August 27, 2012, Ms. Clark called to report a manhole cover was left off after work at a
- 7       lift station. Our operator placed the manhole cover into position on the same day it was
- 8       reported.

9       **Gigi Peemoeller, 16010 Samar Court**

10      A.       During the hearing, Ms. Peemoeller reported concerns about dark residue in her toilets

11      and showerheads. We do not have record of her contacting our office to report a water quality

12      issue. Moreover, complaints about water quality are not frequent in the TCWS system. However,

13      if Ms. Peemoeller desires, our field personnel respond promptly and investigate the issue.

14

15      **Kelly Macaluso, 4075 Triton Drive**

16      A.       Counsel for Tega Cay will move to strike certain of the witness' testimony and an

17      exhibit pertaining to certain financial transactions involving shareholders of Utilities, Inc. based

18      on their lack of relevance and inadmissibility as hearsay.

19             However, I will respond to Ms. Macaluso's testimony regarding issues that she

20      experienced issues accessing her account through our self service option on the company's website

21      in December 2012. We do not have record of her contacting our office to report the problem and

22      are unable to determine if the issue was caused by her internet provider or with the company

23      website.

1 During the hearing, she also reported that when printing her September 23, 2012 bill from  
2 web self service, that the font was garbled at the bottom of the page. Again, we do not have  
3 record of her contacting our office to report the problem. According to personnel in our IT  
4 Department, issues such as garbled fonts are usually caused by the user's computer or printer  
5 producing a post script error. We have not received complaints from any other customers about  
6 garbled fonts when they print their bill. In fact, thousands of our customers across the country  
7 have access to web self service.

8 Ms. Macaluso also expressed concerns about the \$3.00 fee charged by the payment vendor  
9 to make a payment online. The Company offers the option of paying by phone or internet with our  
10 third party vendor, Bill Matrix. Bill Matrix will accept credit/debit cards and checks for payment  
11 of utility bills. There is a \$3.00 convenience fee charged by Bill Matrix for customers who  
12 choose to use this payment option. However, the Company has several other payment options  
13 available to our customers. Customers may choose to mail their payment to the address on the  
14 payment stub for the cost of a postage stamp. They may also choose to sign up for auto draft from  
15 their bank account or use the online banking option through their financial institution. Both of  
16 these options are available at no cost to the customer. Customers may also make cash payments at  
17 any Wal-Mart location nationwide. Customers have the option of paying \$.88 for standard 2-3  
18 day processing or they may choose to pay \$1.88 for next-day processing.

19 All of the payment options are available to customers at any time. It is the customer's  
20 choice to incur a fee based on the payment option selected, and the third-party fees associated with  
21 paying by phone, internet or at a local pay station are directly collected from the customer by the  
22 vendor. The company does not collect or retain any payment processing convenience fees.



1

2   **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

3   **A. Yes.**

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below **via email** on the date indicated below:

RE: Application of Tega Cay Water Service, Inc. for  
Adjustment of Rates and Charges and Modifications to  
Certain Terms and Conditions for the Provision of Water  
and Sewer Service

Docket No. 2012-177-WS

PARTIES SERVED: **VIA EMAIL**  
**jnelson@regstaff.org;shudson@regstaff.org**  
Jeffrey M. Nelson, Esquire  
Shannon B. Hudson, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

PLEADING: Prefiled Testimony of Karen Sasic in Response to Public  
Testimony of 1/8/13

January 24, 2013

  
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MaryJo Lawracy, Legal Assistant